

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO. 18-03605 EAG

AMILCAR NORAT COLLAZO

*Debtor*

CHAPTER 13

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

TO THE HONORABLE COURT:

**NOW COMES** Debtor herein, **AMILCAR NORAT COLLAZO**, by his undersigned attorney and very respectfully ALLEGES AND PRAYS:

1. Chapter 13 Trustee, Jose R. Carrion, filed a Motion to Dismiss stating that debtor had failed to make plan payments and had in arrears the amount of \$1,500.00.
2. On February 5<sup>th</sup>, 2021, debtor made payments to the Chapter 13 Trustee in the total amount of \$1,500.00. (See evidence attached hereto)
3. The balance owed of this date, is January and February 2021, and both payments will be made before the end of this month.
4. Due to the above informed, it is respectfully requested that the Motion to Dismiss be denied.

WHEREFORE debtor respectfully requests the Honorable Court that the Motion to Dismiss be denied and that all other remedies which are proper and just be also granted.

I HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee, Alejandro Oliveras; US Trustee and to all creditors registered to said system. On this date, I have sent copy of said document by regular mail to all parties in interest that are non CM/ECF participants as of the creditor matrix attached hereto

In San Juan, Puerto Rico this 11<sup>th</sup> day of February 2021.

**MODESTO BIGAS LAW OFFICE**

Attorneys for Debtor

P.O. Box 7462

Ponce, P.R. 00732-7462

Tel. 844-1444; Fax 842-4090

By: /s/ Alexandra Bigas Valedon  
**ALEXANDRA BIGAS VALEDON**  
U.S.D.C. NO. 220109  
alexandra.bigas@gmail.com

17-140B ResponseMTD...



Heidy Rodriguez <bigaslawoffice@gmail.com>

## Fwd: Payment Confirmation

1 message

Amilcar Norat Collazo

Fri, Feb 5, 2021 at 2:51 PM

To: Heidy Rodriguez <bigaslawoffice@gmail.com>

Enviado desde mi iPhone

Inicio del mensaje reenviado:

De: payments@ch13sju.com

Fecha: 5 de febrero de 2021, 8:16:54 a. m. AST

Para:

Asunto: Payment Confirmation

Payment Confirmation


Capitulo 13 Alejandro Oliveras

Reference Number: 8b3a6a6989e5707

Hello, AMILCAR NORAT COLLAZ

We would like to let you know that **Capitulo 13 Alejandro Oliveras** has received your payment.

### Payment Details

Case Number	Payment Description	Amount
1803605	ACH	\$500.00
Transaction Date	Authorization Number	Payment Method
2/5/2021 8:16:52 AM	850774	 (xxxxxx6397)

This is your receipt. Your payment will be processed during the next five (5) working days.



Heidy Rodriguez <bigaslawoffice@gmail.com>

## Fwd: Payment Confirmation

1 message

Amilcar Norat Collazo

Fri, Feb 5, 2021 at 2:50 PM

To: Heidy Rodriguez <bigaslawoffice@gmail.com>

Enviado desde mi iPhone

Inicio del mensaje reenviado:

De: payments@ch13sju.com

Fecha: 5 de febrero de 2021, 8:19:49 a. m. AST

Para:

Asunto: Payment Confirmation

Payment Confirmation

Capitulo 13 Alejandro Oliveras

Reference Number: 89ca845f22d320d

Hello, AMILCAR NORAT COLLAZ

We would like to let you know that **Capitulo 13 Alejandro Oliveras** has received your payment.

### Payment Details

Case Number	Payment Description	Amount
1803605	ACH	\$500.00
Transaction Date	Authorization Number	Payment Method
2/5/2021 8:19:47 AM	850804	PERSONAL CHECKING (xxxxxx6397)

This is your receipt. Your payment will be processed during the next five (5) working days.



Heidy Rodriguez <bigaslawoffice@gmail.com>

## Fwd: Payment Confirmation

1 message

Amilcar Norat Collazo

Fri, Feb 5, 2021 at 2:50 PM

To: Heidy Rodriguez <bigaslawoffice@gmail.com>

Enviado desde mi iPhone

Inicio del mensaje reenviado:

De: payments@ch13sju.com

Fecha: 5 de febrero de 2021, 8:22:01 a. m. AST

Para:

Asunto: Payment Confirmation

Payment Confirmation


Capitulo 13 Alejandro Oliveras

Reference Number: 65e9d2feb020540

Hello, AMILCAR NORAT COLLAZ

We would like to let you know that **Capitulo 13 Alejandro Oliveras** has received your payment.

### Payment Details

Case Number	Payment Description	Amount
1803605	ACH	\$500.00
Transaction Date	Authorization Number	Payment Method
2/5/2021 8:21:58 AM	850837	 (xxxxxx6397)

This is your receipt. Your payment will be processed during the next five (5) working days.

**18-03605-EAG13 AMILCAR NORAT COLLAZO**

**Case type: bk Chapter: 13 Asset: Yes Vol: v US BANKRUPTCY JUDGE: EDWARD A GODOY**

**Date filed: 06/27/2018 Date of last filing: 01/12/2021 Plan confirmed: 10/15/2018**

## Creditors

**ALEXANDRA BIGAS VALEDON**  
PO BOX 7462 (4602096)  
PONCE PR 00732 (cr)

**ALL INTERIOR INC**  
P O BOX 10518 (4602097)  
SAN JUAN PR 00922 (cr)

**AMILCAR A. NORAT MIRANDA**  
PALMA REAL SAGRADO CORAZON APT. 611 (4602098)  
PONCE PR 00716 (cr)

**AMILCAR NORAT COLLAZO**  
35 CALLE JUAN C BORBON (4602095)  
SUITE 65 APARTADO 136 (cr)  
GUAYNABO PR 00969

**ARMANDO TROCHE**  
APARTADO 2188 (4602099)  
COAMO PR 00769 (cr)

**ASUME-GISELA COLON SANTIAGO**  
PO BOX 71316 SAN JUAN PR 00936-8416 (4616382)  
(cr)

**ASUME-NORMA MIRANDA RIVERA**  
PO BOX 71316 SAN JUAN PR 00936-8416 (4616385)  
(cr)

**AUTORIDAD DE ACUEDUCTOS Y ALCANTARILLADO**  
P O BOX 70101 (4602100)  
SAN JUAN PR 00936 (cr)

**AUTORIDAD DE ENERGIA ELECTRICA**  
PO BOX 363508 (4602101)  
SAN JUAN PR 00936-3508 (cr)

**CONCRETE TECK**  
P O BOX 370 (4602102)  
BARRANQUITA PR 00794 (cr)

**DEPT DE TRANSPORTACION Y OBRAS PUBLICAS**  
P O BOX 7266 (4602103)  
PONCE PR 00732 (cr)

**FIRST PREMIER BANK**  
P O BOX 5529 (4602104)  
SIOUX FALLS SD 57117 (cr)

**GISELA COLON** (4602105)

P O BOX 1625  
COAMO PR 00769

(cr)

**JEFFERSON CAPITAL SYSTEMS LLC**  
PO BOX 7999  
ST CLOUD MN 56302

(4602106)  
(cr)

**LIBERTY**  
P O BOX 192296  
SAN JUAN PR 00919

(4602107)  
(cr)

**MARBLE SHOP**  
35 CALLE JUAN C BORBON SUITE 297  
GUAYNABO PR 00969

(4602108)  
(cr)

**MARINA PDR OPERATIONS, LLC**  
4900 CARR. NO. 3  
FAJARDO PR 00738-4067

(4602109)  
(cr)

**PR TELEPHONE**  
P O BOX 71401  
SAN JUAN PR 00936

(4602110)  
(cr)

**PREPA - BANKRUPTCY OFFICE**  
PO BOX 364267  
SAN JUAN PR 00936

(4615079)  
(cr)

**RICHARD A. VITO**  
URB. SANTA ISIDRA III  
WASH N POST PMB 13  
FAJARDO PR 00738-4274

(4602111)  
(cr)

**VENTOR CORP**  
P O BOX 2727  
CAROLINA PR 00984

(4602112)  
(cr)

PACER Service Center			
Transaction Receipt			
02/11/2021 11:28:33			
<b>PACER Login:</b>	mbigasme3731:2510751:0	<b>Client Code:</b>	
<b>Description:</b>	Creditor List	<b>Search Criteria:</b>	18-03605-EAG13 Creditor Type: All
<b>Billable Pages:</b>	1	<b>Cost:</b>	0.10